

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
v.)	Civil Action No. 15-10734-NMG
)	
\$16,037.90 IN UNITED STATES CURRENCY)	
SEIZED ON OCTOBER 15, 2014, FROM BANK)	
OF AMERICA ACCOUNT, # XXXXXXXXX4100)	
HELD IN NAME OF DBA NEW FAMILY 88)	
SUPERMARKET; \$53,791.09 IN UNITED)	
STATES CURRENCY SEIZED ON OCTOBER)	
15, 2014, FROM TD BANK ACCOUNT)	
#XXXXXXX6574 HELD IN NAME OF NEW)	
FAMILY 88 SUPERMARKET; AND \$5,700 IN)	
UNITED STATES CURRENCY SEIZED ON)	
OCTOBER 15, 2014, FROM NEW FAMILY 88)	
SUPERMARKET, 877-883 MAIN STREET,)	
WORCESTER, MASSACHUSETTS,)	
Defendants.)	

MOTION FOR FINAL JUDGMENT AND ORDER OF FORFEITURE

The United States of America, by its attorney Andrew E. Lelling, United States Attorney for the District of Massachusetts, hereby moves that this Court endorse the proposed Final Judgment and Order of Forfeiture submitted herewith, ordering the forfeiture to the United States of the following *in rem* defendant properties:

- (a) \$16,037.90 in United States currency, seized on October 15, 2014, from Bank of America account #XXXXXXX4100 held in name of DBA New Family 88 Supermarket;
- (b) \$53,791.09 in United States currency, seized on October 15, 2014, from TD Bank account #XXXXXXX6574 held in name of New Family 88 Supermarket; and
- (c) \$5,700 in United States currency, seized on October 15, 2014, from New Family 88 Supermarket, 877-883 Main Street, Worcester, Massachusetts

(collectively, the "Subject Accounts").

In support of this Motion, the Government states that on October 31, 2019, the United States filed a Motion for Order to Show Cause Why Claimant's Claim/Answer Should Not be

Motion allowed. SKM/Gorton, USDT 2/14/20

Dismissed and Request for Notice of Default (Docket No. 67), and on January 8, 2020, this Court allowed the United States' request and issued a Notice of Default (Docket No. 69). Default was entered against Liangdong Lu, and all other persons claiming an interest in the Subject Accounts, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for failure to plead or otherwise defend in the instant *in rem* civil forfeiture action.

WHEREFORE, the United States of America requests that this Court enter a Final Judgment and Order of Forfeiture, forfeiting the Subject Accounts. A proposed Order is submitted herewith.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney,

By: /s/ Carol E. Head
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Date: January 14, 2020

CERTIFICATE OF SERVICE

I hereby certify that the Motion for Final Judgment and Order of Forfeiture, as well as the proposed Final Judgment and Order of Forfeiture were filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. The document will also be sent, via Federal Express and Certified Mail, to the *pro se* Claimant, Liangdong Lu, at his last known address of 319 Wildwood Avenue, Worcester, Massachusetts 01603.

/s/ Carol E. Head
Carol E. Head
Assistant United States Attorney

Date: January 14, 2020